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NEW JERSEY BOARD OF CHIROPRACTIC EXAMINERS

JEFFREY S. CHIESA ATTORNEY GENERAL OF NEW JERSEY Division of Law 124 Halsey Street, 5th Floor P.O. Box 45029 Newark, New Jersey 07101

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STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
BOARD OF CHIROPRACTIC EXAMINERS

IN THE MATTER OF THE SUSPENSION OR REVOCATION OF THE LICENSE OF

Administrative Action

PETER V. PLUMB, D.C. LICENSE NO. 38MC00238900 CONSENT ORDER

TO PRACTICE CHIROPRACTIC
IN THE STATE OF NEW JERSEY

This matter was opened to the New Jersey State Board of Chiropractic Examiners (hereinafter the "Board"), upon receipt of information that Respondent, Peter V. Plumb, D.C., was arrested by the Lawrence Township Police Department and charged with one Count of violation of N.J.S.A. 2C:14-2(c)1, Sexual Assault with Force, and one Count of violation of N.J.S.A. 2C:14-3(b), Criminal Sexual Contact, with certain of his female patients.

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On December 28, 2012, an Order to Show Cause and Verified Complaint were filed with the Board. To date Respondent has not filed an Answer to the allegations contained in the Verified Complaint.

The allegations, if proven, would demonstrate that Respondent engaged in professional misconduct and acts constituting crimes of moral turpitude and crimes which relate adversely to the practice of chiropractic, in violation of N.J.S.A. 45:1-21(e) and (f).

The parties being desirous of resolving this matter without the necessity of further proceedings and it appearing that Respondent has read the terms of the within Order and understands their meaning and effect and consents to be bound by same, and it further appearing that Respondent wishes to enter into an agreement without making admissions, and the Board finding the within disposition adequately protective of the public health, safety, and welfare; and it appearing that good cause exists for the entry of the within Order;

IT IS, therefore, on this // day of January ,2013;

ORDERED AND AGREED that:

- 1. The license of Peter V. Plumb, D.C. to practice chiropractic in the State of New Jersey is hereby suspended pending the disposition of the plenary hearing and until further Order of the Board of Chiropractic Examiners.
- 2. Respondent, Peter V. Plumb, D.C., shall cease and desist all patient contact, including but not limited to, the rendering of chiropractic care, massage, yoga, and rehabilitation services such as stretching and exercise, pending the disposition of the plenary hearing and until further Order of the Board.

- 3. Notwithstanding the immediate suspension of his license and his immediate cessation of all patient contact, Peter V. Plumb D.C. shall be permitted to engage in administrative tasks at Plumb Chiropractic Center until January 17, 2013. After January 17, 2013, Dr. Plumb will be prohibited from occupying, sharing or using the office space at either Plumb Chiropractic Center or any other office in which another licensee provides health care services, as set forth in the attached Directives of the Board.
- 4. Peter V. Plumb D.C. shall immediately deliver his license and/or wall certificate to practice chiropractic to the Board, c/o Doreen A. Hafner, DAG, 124 Halsey Street, 5th Floor, P.O. Box 45029, Newark, New Jersey, 07101.
- 5. The parties hereby stipulate that entry of this Consent Order shall not be deemed an admission by Peter V. Plumb, D.C. of any of the allegations contained in the Verified Complaint nor an admission of any of the criminal charges referenced therein and shall not constitute a waiver of any defenses he may assert with reference to the criminal charges and the Verified Complaint.
- 6. Nothing contained herein shall restrict or limit this Board, the Attorney General or any other law enforcement entities from further investigation and prosecution of this matter.
- 7. It is understood that by entry of this Order, the parties herein do not waive any right to apply for any additional relief provided for by law.

8. The Directives of the Board applicable to any Chiropractic Board licenses who is suspended, revoked or whose surrender of licensure has been succepted are incorporated by reference as though fully eat forth herein, whether or not they are attached hereto.

STATE BOARD OF CHIROPRACTIC EXAMINERS

Albert Stabils, Jr., D.C. Board President

I have road the above terms of the within Order. I understand the terms of the Order and I agree to be bound by same.

Pater V. Plumb, D.d.

Consent is hereby given as to the form and entry of this Order.

Michael J. Keating, Beq Attorney for Respondent

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STATE BOARD OF CHIROPERCTIC EXPANSERS

Albert Stabile, Pr., D.C. Board President

I have read the above terms of the within Order. I understand the terms of the Order and I agree to be bound by game.

Parker V. Flumb, D.d.

Consent is hereby given as to the form and entry of this Order.

Michael J. Kenting, Esq. Attorney for Besponden